Judge: Chapter:

## UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re: No. 10-19817-MLB

GROSSMAN, ADAM

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EX PARTE APPLICATION FOR ORDER AUTHORIZING EMPLOYMENT OF SPECIAL COUNSEL FOR TRUSTEE

Marc Barreca

Debtor.

Ronald G. Brown, the duly appointed Chapter 7 Trustee in the above-captioned bankruptcy case, applies to this Court for authority to employ Stephen M. Dean, as Special Counsel for Trustee and in support thereof states as follows:

- 1. On August 19, 2010, Adam Grossman filed a Chapter 11 bankruptcy petition in the United States Bankruptcy Court for the Western District of Washington at Seattle. On March 11, 2011, this case was converted to Chapter 7 and on March 15, 2011, Ronald G. Brown was appointed as trustee of the estate.
- 2. The assets of the estate includes several pieces of real property located in California. The trustee desires to hire Mr. Dean to evict the current tenants/squatters in these properties and to assist the trustee in any title issues that may arise from the sale of these properties on an hourly bases, subject to Court approval after notice and a hearing.
- 3. The trustee is aware of no connections between Stephen M. Dean and the debtor, creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee other than as set forth above. No notice to creditors or interested parties of this motion is necessary pursuant to 11 U.S.C. section 102(1) and FRBP 2002.

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TRUSTEE'S APPLICATION TO EMPLOY SPECIAL COUNSEL

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Wood & Jones, P.S. 303 N. 67<sup>th</sup> Street Seattle WA 98103 (206) 623-4382

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WHEREFORE, the trustee applies to the Court for an order authorizing the employment of 1 Stephen M. Dean as Attorney for the Trustee to perform the legal services described in this 2 application, with all compensation subject to Court order upon notice to creditors and a hearing. 3 DATED: May 10, 2012. 4 5 6 /s/ Denice Moewes 7 Denice E. Moewes, WSBA #19464 Attorney for Trustee 8 9 10 I CERTIFY under penalty of perjury that on May 10, 2012 I caused a copy of the foregoing 11 document to be delivered to the U.S. Trustee by email at: <u>USTPRegion18.SE.ECF@usdoj.gov</u>. 12 13 /s/ Dominique Marlatt 14 Dominique Marlatt 15 16 Special Counsel - App to Hire 17 18 19 20 21 22 23 24 25 26 27 28 29 Wood & Jones, P.S. TRUSTEE'S APPLICATION TO 303 N. 67<sup>th</sup> Street

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EMPLOY SPECIAL COUNSEL

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